

FILED

MAR 13 2018

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS
BY [Signature] DEPUTY

UNITED STATES OF AMERICA,

Plaintiff,

V.

SARAH RASHELLE ALMAGUER
aka Sarah Rashelle Evans

Defendant

CRIMINAL NO.

W18CR070INDICTMENT

[VIO: COUNT ONE: 18 U.S.C. 2251(b)
and (e)—Sexual Exploitation of Children;
COUNT TWO and COUNT THREE: 18
U.S.C. 2251(a) and (e) – Production of Child
Pornography; COUNT FOUR: 18 U.S.C.
2252A(a)(5)(B) – Possession of Visual
Depictions of Sexual Activities by Minors
COUNT FIVE: 18 U.S.C. 2252(a)(2) and
(b) – Distribution of Child Pornography]

THE GRAND JURY CHARGES:

COUNT ONE**[18 U.S.C. 2251(b) and (e)]**

On or about December 14, 2017, the exact date unknown to the Grand Jury, in the Western
District of Texas and elsewhere, Defendant,

SARAH RASHELLE ALMAGUER,
aka Sarah Rashelle Evans,

being a parent, legal guardian and having custody and control of a minor, did knowingly permit
and attempt to permit a minor, M.A., to engage in sexually explicit conduct, as defined in Title 18,
United States Code, Section 2256, for the purpose of producing visual depictions of such conduct,
knowing and having reason to know that such visual depiction would be transported in interstate
and foreign commerce and mailed, and the visual depictions were produced using materials that
had been mailed, shipped, and transported in interstate or foreign commerce, by any means,

including by computer, and such visual depictions had actually been transported in interstate and foreign commerce, in violation of Title 18, United States Code, Sections 2251(b) and (e).

COUNT TWO
[18 U.S.C. 2251(a) and (e)]

On or about December 6, 2017, the exact date unknown to the Grand Jury, in the Western District of Texas and elsewhere, Defendant,

SARAH RASHELLE ALMAGUER,
aka Sarah Rashelle Evans,

did employ, use, persuade, induce, entice, and coerce or did attempt to employ, use, persuade, induce, entice, and coerce a minor, A.Q., to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, and such visual depiction was produced using materials that had been mailed, shipped, and transported in interstate or foreign commerce, by any means, all in violation of Title 18, United States Code, Sections 2251(a) and (e).

COUNT THREE
[18 U.S.C. 2251(a) and (e)]

On or about December 6, 2017, the exact date unknown to the Grand Jury, in the Western District of Texas and elsewhere, Defendant,

SARAH RASHELLE ALMAGUER,
aka Sarah Rashelle Evans,

did employ, use, persuade, induce, entice, and coerce or did attempt to employ, use, persuade, induce, entice, and coerce a minor, M.V., to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, and such visual depiction was produced using materials that had been mailed, shipped, and transported in interstate or foreign commerce, by any means, all in violation of Title 18, United States Code, Sections 2251(a) and (e).

COUNT FOUR
[18 U.S.C. 2252A(a)(5)(b)]

On or about February 26, 2018, in the Western District of Texas, Defendant,

SARAH RASHELLE ALMAGUER,
Aka Sarah Rashelle Evans,

did knowingly possess and attempt to possess material which contained one or more images of child pornography, to-wit: images depicting minors, including prepubescent minors and minors who had not attained twelve (12) years of age, engaging in genital-genital, anal-genital, oral-genital sexual intercourse and lascivious exhibition of the genitals and pubic area, that had been mailed, shipped and transported using any means and facility of interstate and foreign commerce, and that had been produced using materials that had been mailed, shipped and transported in and affecting interstate and foreign commerce, by any means, including by computer, all in violation of Title 18, United States Code, Sections 2252A(a)(5)(B), 2252A(b)(2), and 2256(8)(A).

COUNT FIVE
[18 U.S.C. 2252(a)(2) and (b)]

On or about December 6, 2017, in the Western District of Texas, Defendant,

SARAH RASHELLE ALMAGUER,
aka Sarah Rashelle Evans,

knowingly distributed and attempted to distribute visual depictions, using any means or facility of interstate or foreign commerce and that had been shipped or transported in or affecting interstate or foreign commerce, and that had been produced using materials that had been mailed, shipped and transported in and affecting interstate and foreign commerce by any means including by computer, and the production of such visual depiction involved the use of a minor engaging in sexually

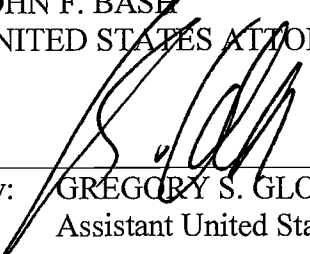
explicit conduct and the visual depiction is of such conduct, in violation of Title 18, United States Code, Sections 2252(a)(2) and (b).

A TRUE BILL:

SEALED DOCUMENT PURSUANT
TO E.O. 12958 OF 2002

FOREPERSON

JOHN F. BASH
UNITED STATES ATTORNEY



By: GREGORY S. GLOFF
Assistant United States Attorney